

REMARKS

Claims 1, 2 and 4-6, as amended, remain herein.

1. Claims 1-3 were rejected under 35 U.S.C. § 103(a) over Noriyuki et al. JP 04-365349 and Kazuo et al. JP 2000-001771. Noriyuki discloses trays carrying substrates being transferred through different chambers. Trays are cleaned when an accumulated film reaches a certain thickness. Noriyuki does not disclose repeatedly using a plurality of substrate holders to form film on a substrate, such that when the film is formed on a substrate, at least one substrate holder in the evaporating room is coated with film from forming the film on the substrate, and at least one holder in the evaporating room is not coated with said film, as recited in applicants' claim 1.

Nor does Kazuo disclose or suggest what Noriyuki lacks. Kazuo discloses depositing a dielectric protective layer on a substrate surface. Kazuo does not disclose the elements of claim 1 recited above.

Thus, neither Noriyuki nor Kazuo, independently or combined, discloses every element of applicants' claim 1. Nor is there any teaching in Noriyuki, Kazuo, or any other known source, that would motivate one of ordinary skill in the art to combine Noriyuki and Kazuo to render applicants' claim 1 obvious. Thus, Noriyuki and Kazuo are not proper grounds for rejection under 35 U.S.C. § 103(a), and reconsideration and withdrawal of the rejection are respectfully requested.

2. Claim 4 was rejected under 35 U.S.C. § 103(a) over Noriyuki, Kazuo, and Hide et al. JP 2001-316797. Neither Noriyuki nor Kazuo discloses repeatedly using a plurality of substrate holders, such that when a film is formed on a substrate, at least one substrate holder in the evaporating room is coated with film from forming the film on the substrate, and at least one holder in the evaporating room comprises elements not coated with

said film, as recited in applicants' claim 5, from which claim 4 depends. Hide does not supply what Noriyuki and Kazuo lack.

Hide discloses detachable shields which prevent film from depositing onto substrate carriers. Hide does not disclose the aforementioned elements of applicants' claim 5.

Thus, neither Noriyuki, Kazuo, nor Hide, independently or combined, discloses every element of applicants' claim 4. Nor is there any teaching in Noriyuki, Kazuo, Hide, or any other known source, that would motivate one of ordinary skill in the art to combine Noriyuki, Kazuo, and Hide to render applicants' claim 4 obvious. Thus, Noriyuki, Kazuo, and Hide are not proper grounds for rejection under 35 U.S.C. § 103(a), and reconsideration and withdrawal of the rejection are respectfully requested.

For the foregoing reasons, all claims 1, 2 and 4-6 are now fully in condition for allowance, which is respectfully requested. The PTO is hereby authorized to charge or credit any necessary fees to Deposit Account No. 19-4293. Should the Examiner deem that any further amendments would be desirable in placing this application in even better condition for issue, he is invited to telephone applicant's undersigned representative.

Respectfully submitted,



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